

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

ANGELA M. GONZALEZ-HASSAN,	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION
v.	)	FILE NO.: _____
	)	
ATLANTA HARM REDUCTION	)	
COALITION, INC.,	)	
	)	
Defendant.	)	

**NOTICE OF REMOVAL**

COMES NOW Defendant Atlanta Harm Reduction Coalition, Inc. (“Defendant”)<sup>1</sup> and, pursuant to 28 U.S.C. §§ 1441 and 1446, gives notice of the removal of this civil action from the Superior Court of Gwinnett County, Georgia to the United States District Court of the Northern District of Georgia, Atlanta Division, and shows the following:

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<sup>1</sup> On August 18, 2022, Atlanta Harm Reduction Coalition became Georgia Harm Reduction Coalition, Inc. *See* Georgia Secretary of State Record, attached as **Exhibit A**. Thus, Defendant’s proper name is Georgia Harm Reduction Coalition, Inc.

## I. FACTUAL BACKGROUND

1.

On or about March 6, 2023, Plaintiff Angela M. Gonzalez-Hassan (“Plaintiff”) filed a Complaint alleging race discrimination in violation of Title VII of the Civil Rights Act of 1964 and the Georgia Fair Employment Practices Act (“First Complaint”) in the Superior Court of Gwinnett County, Georgia, Case No. 23-A-01760-3.

2.

On April 3, 2023, Plaintiff filed an Amendment to her First Complaint (“Amendment”) (collectively with the First Complaint, the “Complaint”) in the Superior Court of Gwinnett County, Georgia, Case No. 23-A-01760-3, alleging violations of “Georgia and Federal law for the harassment, retaliation, and wrongful termination that she has suffered.” Amendment ¶ 5. This action remains pending.

3.

Defendant was served with the Complaint on April 5, 2023; therefore, this Notice of Removal is timely pursuant to 28 U.S.C. § 1446(b).

4.

Pursuant to 28 U.S.C. § 1446(a), copies of the summons and Complaint served on Defendant are attached as **Exhibit B** and constitutes all process, pleadings, and

orders served on or by Defendant in the Gwinnett County Superior Court to date. Defendant has not made an appearance in that action as of the date of this filing.

## **II. FEDERAL QUESTION GRANTS THIS COURT SUBJECT MATTER JURISDICTION**

5.

Removal is proper because this Court has federal question subject matter jurisdiction over this civil action pursuant to 28 U.S.C. §§ 1331 and 1441(a). Because a district courts has removal jurisdiction over any civil action in which it has original jurisdiction, and because it has original jurisdiction over “all civil actions arising under the Constitution, laws, or treaties of the United States,” Plaintiff’s allegations of race discrimination pursuant to Title VII of the Civil Rights Act of 1964, as amended 42 U.S.C. § 2000e *et seq*, grant this Court jurisdiction for these and all related claims. First Complaint, unnumbered paragraph, Count I; Amendment ¶¶ 1-5.

6.

Contemporaneous to this filing, Defendant has sent written notice to Plaintiff and will file a Notice of Filing of Notice of Removal with the Clerk of the Superior Court for Gwinnett County, Georgia pursuant to 28 U.S.C. § 1446. A copy of the Notice of Filing of Notice of Removal, without exhibits, is attached as **Exhibit C**.

### III. VENUE IS PROPER IN THE NORTHERN DISTRICT OF GEORGIA

7.

Plaintiff is a citizen of the State of Georgia. First Complaint ¶ 1.

8.

Defendant is a domestic, non-profit corporation with its principal place of business at 1231 Joseph E. Boone Blvd., Atlanta, GA 30314.

9.

Gwinnett County, Georgia is one of the counties comprising the Northern District of Georgia - Atlanta Division. Because this action was originally filed in the Superior Court of Gwinnett County, venue is proper in the Northern District of Georgia - Atlanta Division, in accordance with 28 U.S.C. § 1441(a).

10.

Defendant has provided written notice to Plaintiff of its Notice of Removal pursuant to 28 U.S.C. § 1446(d). A copy of Defendant's Notice of Removal to Plaintiff, without exhibits, is attached as **Exhibit D**.

WHEREFORE, Defendant prays that the above-captioned lawsuit be removed to the United States Court for the Northern District of Georgia, Atlanta Division.

Respectfully submitted this 4th day of May 2023.

**BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.**

/s/ Jordana K. Oppenheim

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*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day filed a copy of the foregoing *Notice of Removal* with the Clerk of Court using the Court's ECF system which will automatically send notification to all counsel of record.

Additionally, I certify that on this date I served a copy of the foregoing *Notice of Removal* via electronic mail and First-Class U.S. Mail, postage prepaid, addressed as follows:

Angela M. Gonzalez-Hassan  
2620 N. Berkeley Lake Rd. NW  
Apt 418  
Duluth, Georgia 30096  
[angee.gonzalez@yahoo.com](mailto:angee.gonzalez@yahoo.com)

Respectfully submitted this 4th day of May 2023.

**BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.**

/s/ Jordana K. Oppenheim  
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*Counsel for Defendant*